

1

THE HONORABLE RONALD B. LEIGHTON

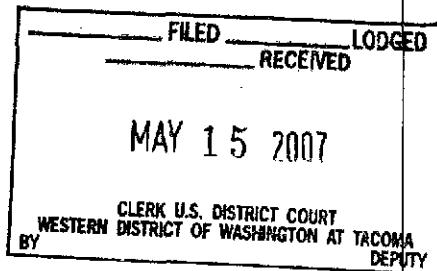
2



3

5-CV-05437-ORD

4



5

6

7

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 GRAYS HARBOR ADVENTIST CHRISTIAN
11 SCHOOL, a Washington non-profit
organization; GREG G. BOGDANOVICH, an
12 individual; and MARY LAFOREST, an
individual, on behalf of themselves and all others
similarly situated,

13 Plaintiffs,

14 v.

15 CARRIER CORPORATION, a Delaware
corporation,

16 Defendant.

NO. 05-05437 RBL

**MOTION AND [PROPOSED]
ORDER TO SUBMIT
CONFIDENTIAL DOCUMENTS
CONDITIONALLY UNDER SEAL**

Note on Motion Calendar:
May 14, 2007

CLERK'S ACTION REQUIRED

I. MOTION

Pursuant to Section VIII.2.b. of the Protective Order entered in this matter, Plaintiffs submit to the Court the following documents CONDITIONALLY UNDER SEAL:

1. Declaration of Nancy A. Pacharzina Submitted in Support of Plaintiffs' Motion to Exclude Expert Testimony and exhibits thereto;

This document contains either documents or numerous references and quotes of documents that Defendant designated as "Confidential Information" under the terms of the Protective Order. Pursuant to Section VIII.2.b. of the Protective Order, Defendant has ten (10) business days from the day these documents are submitted to the Court to file a motion to seal

MOTION AND [PROPOSED] ORDER TO SUBMIT CONFIDENTIAL
DOCUMENTS CONDITIONALLY UNDER SEAL

[NO. 05-05437 RBL] - 1

4182/001/205341.1

TOUSLEY BRAIN STEPHENS PLLC
1700 Seventh Avenue, Suite 2200
Seattle, Washington 98101
TEL. 206.682.5600 • FAX 206.682.2992

1 the records pursuant to GR 15(c)(2)(B). If no such motion is filed, Plaintiffs will refile the
2 records unsealed after ten (10) business days.

3 **II. ORDER**

4 In light of all the above:

5 **IT IS HEREBY ORDERED** the above listed records shall be conditionally sealed by
6 the Clerk of the Court. If no motion to seal is filed within ten (10) business days after entry of
7 this Order, the documents will be unsealed and refiled.

8 DATED this 15th day of May, 2007.

9 
10

11 UNITED STATES DISTRICT JUDGE

12 Presented by:

13 TOUSLEY BRAIN STEPHENS PLLC

14 By: /s/Nancy A. Pacharzina

15 Kim D. Stephens, WSBA #11984

kstephens@tousley.com

16 Nancy A. Pacharzina , WSBA #25946

npacharzina@tousley.com

17 1700 Seventh Avenue, Suite 2200

Seattle, Washington 98101

Telephone: 206.682.5600

18 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

19 Jonathan D. Selbin, *Admitted Pro Hac Vice*

jselbin@lchb.com

20 Lieff, Cabraser, Heimann & Bernstein, LLP

780 Third Avenue, 48th Floor

21 New York, New York 10017-2024

Telephone: 212.355.9500

22 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

23 Lori E. Andrus, *Admitted Pro Hac Vice*

landrus@lchb.com

24 H. John Gutierrez, *Admitted Pro Hac Vice*

hjgutierrez@lchb.com

25 Embarcadero Center West

275 Battery Street, 30th Floor

26 San Francisco, California 94111-3339

Telephone: 415.956.1000

MOTION AND [PROPOSED] ORDER TO SUBMIT CONFIDENTIAL
DOCUMENTS CONDITIONALLY UNDER SEAL
[NO. 05-05437 RBL] - 2

4182/001/205341.1

TOUSLEY BRAIN STEPHENS PLLC
1700 Seventh Avenue, Suite 2200
Seattle, Washington 98101
TEL. 206.682.5600 • FAX 206.682.2992